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16 UNITED STATES DISTRICT COURT

17 EASTERN DISTRICT OF CALIFORNIA

18 United States of America,

19 Plaintiff,

20 v.

22 CB SURETY, LLC, et al.,

23 Defendants.

Civil Case No. 2:23-cv-02812-TLN-SCR

SECOND JOINT STATUS REPORT

1 Plaintiff United States of America, and Defendants Thomas Eide, Cascades Pointe at
 2 Clemson LLC, Aric Gastwirth, Reseller Consultants, Inc., and Ambragold, Inc., through counsel,
 3 submit this Second Joint Status Report.¹

4 **I. FUTURE PROCEEDINGS, DISCOVERY, LAW AND MOTION, AND TRIAL**

5 Pursuant to the Court's Order on December 16, 2024, (ECF No. 95) vacating all dates set
 6 forth in the March 11, 2024, Joint Status Report, (ECF No. 68), the parties have met and
 7 conferred and propose the following schedule for future proceedings, discovery, law and motion,
 8 pretrial and trial in this case.

Event	Deadline
Completion of Fact Discovery	August 5, 2025
Expert Disclosures and Reports	October 7, 2025
Rebuttal Expert Disclosures and Reports	November 18, 2025
Completion of Expert Discovery	December 16, 2025
Deadline for Filing Dispositive Motions	March 10, 2026
Joint Notice of Trial Readiness	No later than 30 days after receiving this Court's ruling on last dispositive motion, or if no dispositive motions, by January 16, 2025.

20 Pursuant to the Court's Initial Pretrial Scheduling Order (ECF No. 13), the Court will
 21 issue an order setting dates for the pretrial conference and trial dates after reviewing the parties'
 22 Joint Notice of Trial Readiness.

23
 24
 25 ¹ The clerk of the court has entered a default against the remaining defendants, namely CB Surety LLC, Stephen
 26 Christopher, KP Testing, LLC, Motion Media Marketing, Inc., Peak Bakery LLC, SJC Financial Services, Inc.,
 27 Travis Smith, Bryan Bass, Bass Business Consultants, and Think Processing LLC (collectively, the "Defaulting
 Defendants"). (ECF Nos. 65 and 77.) The United States' motion for default judgment is pending before this Court.
 (ECF No. 90). As a result, the Defaulting Defendants are not parties to this Second Joint Status Report.

1 **II. APPROPRIATENESS OF SPECIAL PROCEDURES**

2 The Parties do not anticipate any special procedures in this action at this time.

3 **III. ESTIMATE OF TRIAL TIME**

4 The Parties estimate that 14 days will be needed for trial.

5 **IV. MODIFICATION OF STANDARD PRETRIAL PROCEDURES**

6 The Parties do not anticipate the need to modify standard pretrial procedures in this
7 action. Should any circumstances arise, the Parties will meet and confer and attempt to stipulate
8 before requesting the Court's involvement.

9 **V. NO RELATED CASES**

10 There are no related filed actions.

11 **VI. SETTLEMENT**

12 Throughout this litigation, the Parties will consider whether the Court's involvement in a
13 settlement conference would be useful. If so, a status report or joint stipulation will be filed. The
14 Parties may also agree to the use of a private mediator.

15 **VII. OTHER MATTERS THAT MAY ADD TO A JUST AND EXPEDITIOUS
16 DISPOSITION**

17 In accordance with 28 U.S.C. § 636(c), Federal Rule of Civil Procedure 73(a), and Local
18 Rule 305, the Parties will consider consenting to magistrate jurisdiction in this action. No other
19 issues are currently known or anticipated. The Parties agree to meet and confer, and specify these
20 efforts, before the filing of any motion.

1 Dated: January 10, 2025

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8 /s/

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10 FRANCISCO L. UNGER
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12 United States Department of Justice

13 *Attorneys for Plaintiff United States of America*

14 Dated: January 10, 2025

15 /s/
16 MATTHEW JACOBS

17 *Counsel for Defendants Aric Gastwirth,
18 Reseller Consultants, Inc., and Ambragold, Inc.*

19 Dated: January 10, 2025

20 /s/
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22 CHRISTOPHER WHELESS

23 *Counsel for Defendants Thomas Eide and
24 Cascades Pointe at Clemson, LLC*